

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**JOSEAN DOMENECH ROBLES,
Defendants.**

Criminal No. 17-498 (JAG)

GOVERNMENTS RESPONSE TO DEFENDANTS MOTION IN LIMINE

The United States of America, through its undersigned counsel, very respectfully states that:

1. We have no objection to the proposed Motion In Limine filed by the defense. The parties have agreed to stipulate that Mr. Domenech-Robles was convicted of a crime punishable by a term of imprisonment exceeding one year on June 16, 2008. Accordingly, he is willing to stipulate to the fact that on the date of the current offense— August 11, 2017— he was a convicted felon. No further evidence would be necessary, and the jury may accept the Stipulation as a proven fact.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of July, 2018.

ROSA EMILIA RODRIGUEZ VELEZ
UNITED STATES ATTORNEY

s/ Omar A. Barroso-Rosario

Omar A. Barroso-Rosario,
U.S.D.C.-PR G02709
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 18, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Omar A. Barroso-Rosario

Omar A. Barroso-Rosario

Special Assistant United States Attorney